AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the

Southern District of Texas

United States of America v. **Rosa Elena MENDEZ-Castillo (22)** **Dallas, Texas, USA** _____ *Defendant(s)*	))) Case No.)) L-21-MJ-))

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____**October 25, 2021**_____ in the county of _____**Webb**_____ in the

_____**Southern**_____ District of _____**Texas**_____ , the defendant(s) violated:

Code Section	Offense Description
8 USC 1324	knowingly and in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

On or about October 25, 2021, at approximately 9:33 pm, defendant Rosa Elena MENDEZ-Castillo, a United States Citizen, applied for admission into the United States at the Lincoln Juarez Port of Entry in Laredo, Texas as a passenger in a commercial bus. Defendant was accompanied by one minor whom she identified as her friend's United States Citizen daughter. Defendant presented a Texas birth certificate bearing the name of J.N. to CBP Officer Erick Hernandez. Defendant & minor were referred to secondary for further inspection. At secondary inspection, the child was interviewed by CBP Officer Marissa Robledo to whom the child stated she was told to memorize the information on the birth certificate. The female minor identified herself as A.S.R. an undocumented citizen & national of Mexico. Rosa Elena MENDEZ-Castillo admitted that the child did not belong to her friend. Defendant stated that she had knowledge that the child was not a United States citizen because the child's grandfather told her when she picked the child up in Mexico. Facts are based on Rosa Elena MENDEZ-Castillo's sworn statement and records of the Customs & Border Protection Service.

☐ Continued on the attached sheet.

/s/ Cynthia C. O'Bryant
Complainant's signature

Cynthia C. O'Bryant, CBP Enforcement Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: _____October 27, 2021_____

_____
Judge's signature

City and state: _____Laredo, Texas_____

Diana Song Quiroga_____ ,U.S. Magistrate Judge
Printed name and title